Charles Talbert		
LROP State ROPS		
Phila PA. 19136		April 25 2019
United States District		MAY - 2 2019 .
Enstern District of Penns	Ainaulys	KATE BARKMAN, Clerk Dept Clerk
Charles TalberT	· Civil Act	TION
<u> </u>	. No. 18-16	20-MAK
Blanche Carney, etal	T nottoM.	Tainlging Complaint
Attached hereto.	of tobustug	the discussion at the
		Feat trialgno Branning
Adds Defendants. Defe	adon'ts that	Are Added, Are prison
Staff members supervis	ed by the	preedsting befordants,
a Estaiting sund tadt	nat niam ba	ed retaliatory conduct
that the first Defend	ents initated	at Pitanel 9 tears a t
Eling LAWSUNTS AGAINS	Aling SHI te	Deal of Prisons.
2		
Amendment is relevi	of , asla , the	dismiss ease number
19-1340-MAK, so that	all befords	nts man be beard on
ser civil matter inst	ent for ba	
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		his place
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Charles TalberT
7901 State Road
Phila. PA. 19136 April 25,2019
United States District CourT
EASTERN District of Pennsylvania
Charles Talbert Chuil Action
N2 No 18-1850-WAK
Blanche Carney
Gerald May
Terance Clark
Terance Shark
Off. S. Ford Amended Complaint
. starad lairadam zamit lia ta baa, lachivibai eluba na zi, Hitaiaiai
To towntraged and lebaling at outing esainted lainters a zaw
Prisons (PDP)
2. Blanche CATNEY (CATNEY), is the prison Commissioner of PDP.
3. Gerald May (May) at all times relevant, was the Warden of the
Curren Frombold Correctional Facility (CFCF).
4. Terance Clark (Clark), At All times relevant, was the Warden of
the Detention Center (DC).
5. Lt. Muhallan (Muhallan), is A Lieutent st CFCF.
6. Off. S. Ford (Ford) is A Correctional Officer at CFCF.
7. Defeadants Are sued individually and in their afficial capacity
8. Plaintiff has filed numerous lausuits under his protected
First Amendment Constitutional right Against PDP staff
including its Alministrators.
including its Administrators. 7.277 teniaga ten livis eint ta pailis laitiai sut teniaga Peus. Altad su bezuns erad 7070 aidtim Rate, notherteiniable od baa
And DC Administration, staff within CFCF, have consed me both
4m 20 noitailates at 7st 2as 1st, 4 rutai lavadoms baa, lasizted
lawsuits.
,7917ABTSOME GOAD LESSON ROLL SINGE 1861 18 1966 TE 1966 LONG LENGTH TO AD . OI
sent to CFCF where CAT new was Commissioner, and MAY was Warden.
Load tind shake I said a becard said to explained to the paint and the said to
then are day of General Population, without notice, hearing, at
chance to abject May and CATREY TENENES And ARRESTORS
Plainliffs transfer to DC where CLATK was Warden.
12. Upon Arcival At DC, Clark and Caracy, reviewed and approved Plaintiff being left in Administrative segregation indefinitely.
Plaintit being left in administrative secregation indefinitely.
3 0

Alim platial alor naitages gentataininka ai bennines Hitain 1951
no explanation as to why he was there under that status.
, notago sitest sininha to and stime shi editains pained . 11.
: eawallof set at test of sey set
d sub said lanathes 2227 bond, portes gools, somede to dant (A)
the plague of nice and roach infestation on the entire
Administrative hoosing unit.
21 descript During a sien was herselmus problems
packages, costing hundreds of dollars in Finnicial loss.
(c) lack of out-of ceil, and outdoor exercise, that caused
boar health conditions such as high cholestral, and
aggrantion to his preexisting chronic lower back pain
AND EQUENCE.
(D) deprived equal access to Islamic literature and Emany
. Soldie boa Bainland at bad Bonitarid toot
noiteillaí Innatastaí, deiagna latasna, eeste shammat teag (3)
of emotional distress, and forced to be on suicide watch.
22 staintiff was subjected to the above punishment, without process,
or exclanation up until his discharge from prison, March 2, 2018.
16. Plaintiff returned to CFCF on or about January 9, 2019.
17. Defendant, Muhalan, established, and maintained, a compaign of
Etinzwal to wate a pail? Attain! To nothailetor in transand
: To you yet 9d? soft tesipan
25. MAT : PLOS, SS. MAT : PLOS, SI. MAT : PLOS, II. MAT : PLOS, OL. MAT (A)
2019; and Feb. 18, 2019, Muballan either:
(1) called Plaintiff a jailbouse soitch; or
. Prujai plibod zvoise Nia Altain/9 bonstonentlin
(B) Feb. 3, 2019; and Feb. 15, 2019, Muhallan either:
(i) called me a "nigger" or
nosing a vi tit nell teripo stoomstate salas sham (ii)
misconduct, in which on Feb. 6, 2019, that misconduct, was declined by Spt. Harmer, finding Plaintiff" not
WAS declined by Sot. HArmer, finding Plaintiff," not
coitu c
la noitestri Hitaial 9 besups toubace y redaulates cidt. 81
bon, raboale, desugan later, restail lacoit one to noitilai
deformation of character causing his false statements made
Against Plaintiff to prouse il- reelings between Plaintiff
Against Plaintiff to Arouse Il-Feelings between Plaintiff And other CFCF Staff members.
tina d beapieza cam Hitain19, Plas, as pravided trada ro no.A
C2 pal 3 At CFCF.
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20. Between February 20, 2019, through February 27, 2019, Ford, established, and maintained a campaign of han had oppression, in retaliation of Plaintiff Filling a low	pezev four
That to neingage a beaintain bas, best ildates bros	użżweut
wal a pailit Witaiala to notailates in noiseerggo bus	noqu tive
21. Between February 30, and, 52, 2019, Erat, bad been 22	zichky p
tine tast as Estama Testo pailes fine paison Attains	that
tinu tant na zatami rado puils, tiau prizual attiniala adutita basan bora, datina azvaltaj a zau Attaiala	<u>S.</u>
63205157 CAW, XORA STAUNT STAUNGE PLOS IS WALTED NO.55	72977
disciplinary detention and thereafter, assigned to Mai	atills
housing unit	
23 After Know was done speaking with Ford, he came a	
o sma set, but Atim pridage snot can know pridates	atiti a
soitch and wanted him Assaulted.	
24. Plaintiff left his cell And CAlled his prior counsel,	Trans
him of his life being in danger, but Knox's message	e And
France woll conser introduction	
25. While explaining this to his coursel on the bousing	<u>tina</u>
25. While explaining this to his course on the bousing phone, Ford was speaking to bnow while they book to over all thinks to propose of them book some some of the second	soked
over at Plaintitt Aggressively.	
26. When Maintiff Look his focus of of them, Knox sno And sucker-purched Plaintiff consing him to Fall	ep nb
and sucher-bunched Plaintiff cousing him to fall	1
	SCASU 10
Telegraphics of based to telegraphics of the saw Pitainia 1.55 to the telegraphics of the same some	
Terror Health To Terror Health To Health To Health To Hospital with A closed head injury and sores	rresdale nidtia
Terror of their roshed to Jefferson Health Tor Hospital with a closed head injury and sores	rresdale nidtia
27. Plaintiff, was ther roshed to Jefferson Health Tor Hospital with a closed head injury, and sores his most. North Caused Plaintiff to be assented by Knox, in tion of Plaintiff Films broads as some Carney	rresdale nidtia
27. Plaintiff, was ther roshed to Jefferson Health Tor thospital with a closed head injury, and sores his mouth. Attached by Knox, in 28. Ford caused Plaintiff to be assaulted by Knox, in tion of Plaintiff filing boxes of or new	slabest Odtica Pallulst ban
27. Plaintiff, was ther roshed to Jefferson Health To Hospital with a closed head injury, and sores his mouth. A closed head injury, and sores his mouth. A closed head injury, and sores, in the following the films here with a final Carney ather of Plaintiff Films herewith against Carney ather 18 Plaintiff was formed and the the afrenentiaged acts. Plaintiff was formed and the the afrenentiaged acts.	elabesta natica natica nad naced
27. Plaintiff, was ther roshed to Jefferson Health To Hospital with a closed head injury, and sores his mouth. A closed head injury, and sores his mouth. A closed head injury, and sores, in the following the films here with a final Carney ather of Plaintiff Films herewith against Carney ather 18 Plaintiff was formed and the the afrenentiaged acts. Plaintiff was formed and the the afrenentiaged acts.	elabesta natica natica nad naced
27. Plaintiff, was ther roshed to Jefferson Health To thospital with a closed head injury, and sores his month. his month. 28. Ford caused Plaintiff to be assaulted by Knox, in tion of Plaintiff filing bows. I against Carney ather The standard members. 29. Due to the aforementioned acts, Plaintiff was for the line of the prementioned acts. 29. Tords aforementioned acts and inactions caused Plaintiff and Sorenes those of the prementioned acts.	orced AHH
27. Plaintiff, was ther roshed to Jefferson Health To Hospital with a closed head injury, and sores his mouth. 18. Ford caused Plaintiff to be assaulted by Knox, in tion of Plaintiff Filing busewits against Carney ather TDP staff members. 29. Due to the aforementioned acts, Plaintiff was for into Protective Custody for safety. 30. Fords aforementioned acts and inactions caused Plaintiff was formal distress; head face, and brain injury; mental	orced by Althor Althor Althor Althor
27. Plaintiff, was ther roshed to Jefferson Health To thospital with a closed head injury, and sores his month with a closed head injury, and sores his month. 28. Ford caused Plaintiff to be assaulted by Knox, in tion of Plaintiff filing brown is against Carney ather of Plaintiff was find better the aforementioned acts. Plaintiff was for into Intective Custody for safety. 29. Due to the aforementioned acts, Plaintiff was for into Intective Custody for safety. 30. Fords a forementioned acts and innerhans caused Plaintiff was formationed acts and brain in jury; areataly and beautiful as the second without and painting without as the second acts and brain in jury; areataly as well as to be retailed when and painting without as a substantial was a substantial acts.	t process.
27. Plaintiff, was ther roshed to Jefferson Health To thospital with a closed head injury, and sores his month with a closed head injury, and sores his month. 28. Ford caused Plaintiff to be assaulted by Knox, in tion of Plaintiff filing brown is against Carney ather of Plaintiff was find better the aforementioned acts. Plaintiff was for into Intective Custody for safety. 29. Due to the aforementioned acts, Plaintiff was for into Intective Custody for safety. 30. Fords a forementioned acts and innerhans caused Plaintiff was formationed acts and brain in jury; areataly and beautiful as the second without and painting without as the second acts and brain in jury; areataly as well as to be retailed when and painting without as a substantial was a substantial acts.	t process.
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The channel was ther roshed to Jefferson Health To Hospital with a closed head injury, and somes his month, with a closed head injury, and somes his month. 28. Ford caused Plaintiff to be assaulted by Knox, in tion of Plaintiff Filing howers to against Carney ather PDP staff members. 29. Due to the aforementioned acts, Plaintiff was for into Protective Custody for safesty. 30. Fords aforementioned acts and innetions caused Plain emotional distress; bead face, and brain injury; mental emotional distress; bead face, and brain injury; mental as well as to be retained apon, and painshed without when the protection is protected without amount in excess of \$250,000.00.00.00.00.00.00.00.00.00.00.00.0	may.
27. Plaintiff, was ther roshed to Jefferson Health To thospital with a closed head injury, and sores his mouth with a closed head injury, and sores his mouth. 28. Ford caused Plaintiff to be assaulted by Knox, in tion of Plaintiff Filing lowers of against Carney ather PIP staff wembers. 29. Due to the aforementioned acts, Plaintiff was for into Protective Custody for safety. 30. Fords a brementioned acts and mactions caused Plaintiff was forest and brain in jury; ments emotional distress; head face, and brain in jury; ments without the forest thinks with a way are to be set without again of the feedants. WHEREFORE, Plaintiff demands judgment against De feedants. Amount in excess of \$250,000,000, with costs, and fres it	may.
The chain of the coshed to Jefferson health To those it all with a closed head in jury, and sores his most. It is most.	may.
27. Plaintiff, was ther roshed to Jefferson health To thospital with a closed head injury, and sores his mouth of Plaintiff filing brosen'ts against Carney ather PIP staff wembers. 29. Due to the abrementioned acts, Plaintiff was finto Protective Custody for safety. 30. Fords abrementioned acts and mactions caused Plaintiff was finto Protective Custody for safety. 30. Fords abrementioned acts and mactions caused Plain emotional distress; head face, and brown in jury; mento as well as to be retained apon, and paintiff demands judgment against De feedants. WHEREFORE, Plaintiff demands judgment against De feedants. I hereby werity under senalty at perjury that the foregoing thereby werity under senalty at perjury that the foregoing.	may.

CITAlberT

Philadelphia Department of Prisons

Philadelphia, PA 19136

PPN 810247

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Hon. Wark A. KeArney, USACJ

U.S. Courthouse

601 MARKET Street

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